

United States District Court for the District of Puerto Rico

Jose M. Betancourt, Individually, next-of-kin and friend
of Manuel Betancourt, AND AS Executor of the Estate of
Manuel Betancourt

Complaint 09-1932(SEC)

Jury Trial Demanded

V.

Kings Harbor Multicare Center, Alexander Stern,
Vincent Marchello, M.D., Daniel Monahan, Shirley McLora,
Directors of nursing, Ms. Feigelbaum, Alan Kopman,
with, R.N., ~~Director of~~ Head of Security.

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMED TO ANSWER the Complaint in this
Action AND TO SERVE A COPY of your answer, OR, if the complaint is
not served with the SUMMONS, TO SERVE a notice of appearance, on the
plaintiff's attorney within twenty (20) days after the service
of this SUMMONS, exclusive of the day of service, on
within (30) days after the service is complete if this summons
is not personally delivered to you within the State.

Plaintiff Jose M. Betancourt individually and as representative
of all the aforementioned plaintiffs is a citizen of the U.S. of
America with residence in San Juan, P.R. and whose
mailing address is P.O. Box 902 1903
San Juan, P.R. 00903-1903

The Honorable Court has jurisdiction based on Diversity of Citizenship.

The matters in controversy exceed ^{the value of} interests, attorney's fees and costs, ^{as required in} 28 USC § 1332.

The action arises under 42 USCA § 1346 (1) (B) (ii), 42 USC 2000 AA, et. al.

This action is also for Breach of Contract, all equitable claims, Breach of Fiduciary Duty, Larceny & Fraud, negligence, medical malpractice, legal malpractice, violations of the Civil Rights of Manuel Betz, and the violations of the Civil Rights of the children of Manuel Betz.

Jose M. Betancourt

The Plaintiff respectfully reserves the right to amend the Complaint.

If you do not serve a Notice of Appearance and Answer to the within Complaint within the applicable time limitation, a judgment may be entered against you by default in the amount of 500,000.00 together with attorney's fees, costs, and disbursements of this action.

Dated: San Juan, P.R.
11 September, 2009.

Jose M. Betancourt
Plaintiff Pro Se

Yonas, etc.
J. Betz
P.O. Box 9021903
San Juan, P.R. 00902.